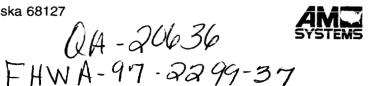
CORNHUSKER MOTOR LINES

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July 26, 1996

Federal Highway Administration Office of Chief Council HCC-10 Room 4232 400 Seventh Street S.W. Washington D.C. 20590

RE: FHWA Docket # MC96-18

To whom it may concern:

In reference to the questions on the Safety Rating Proposal:

1) How should non-rated carriers be categorized?

If a carrier has never had a rating and it has not effected their business, it makes sensethat none is needed. If all of a sudden it becomes an issue (due to pressure from shippers) the carrier could maybe ask and receive from the regional FHWA a letter of temporary status of satisfactory which would remain in effect until the company is audited.

2) How should carriers be selected for audits?

Audits after a carrier has rating should be by a performance based formula with factors such as accidents as defined by 390.5 (where ticketed), or out-of-service violations of either equipment 396.9 or drivers 395.13

3) Whether there is a relationship between hours of service violations and accident rates?

Yes, we have experienced a direct relationship as pressure has been put on drivers to reduce hours of service violations. Over the last several years, the number of accidents has escalated slightly. The internal pressure a driver experiences to work with the dispatcher to keep the customer happy and to get home on a regular basis is adversely effected by present hours of service rules.

What weight should be given to various safety-related factors (i.e. accidents vs. hours of service)

The heavily weighted categories should be chargeable accidents (preventable / ticketed) out of service orders for faulty equipment, haz-mat violations, and flagrant falsification of logs with no visible evidence of trying to correct and solve the reasons.

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